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PROPOSED ATTORNEYS FOR DEBTORS AND
DEBTORS-IN-POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

**PROTOM INTERNATIONAL, INC.
PROTOM INTERNATIONAL, LLC**

DEBTORS.

§
§
§ **CASE NO. 15-32065-BJH-11**
§ **CASE NO. 15-32066-SGJ-11**
§
§ **CHAPTER 11**
§

REQUEST FOR DESIGNATION AS COMPLEX CHAPTER 11 BANKRUPTCY CASE

NOW COME, ProTom International, Inc. and ProTom International, LLC (collectively “Debtors”) which filed for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. § 101 et seq. (the “Bankruptcy Code”) on May 12, 2015 (the “Petition Date”). The undersigned believes that the case qualifies under General Order No. 2006-02 as a complex chapter 11 case because:

1. The Debtors have more than \$10 million in debt.
2. The Debtors have substantial assets, with stated book value of more than \$10 million as of the Petition Date.
3. There are more than 200 parties in interest in this case.

Dated: May 12, 2015

Respectfully submitted,

By: /s/ Kenneth Stohner, Jr.

Kenneth Stohner, Jr.

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**PROPOSED COUNSEL FOR DEBTORS
AND DEBTORS-IN-POSSESSION
PROTOM INTERNATIONAL, INC. AND
PROTOM INTERNATIONAL, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of May, 2015, a true and correct copy of the foregoing was served via the Court's CM/ECF electronic notification system on all parties requesting same, and via facsimile, email and/or US first class mail, postage prepaid to the parties listed on the attached service list.

/s/ Kenneth Stohner, Jr.

Kenneth Stohner, Jr.

SERVICE LIST

Debtor(s)

ProTom International, LLC
1100 Parker Square, Suite 230
Flower Mound, TX 75028-7459

ProTom International, Inc.
1100 Parker Square, Suite 230
Flower Mound, TX 75028-7459

United States Trustee

Office of the United States Trustee
Earle Cabell Federal Building
1100 Commerce Street, Room 976
Dallas, TX 75242
Fax: 214/ 767-8971

Secured Lender

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20 Largest Unsecured Claims

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